

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

CAROL MILLER, individually and on
behalf of all others similarly situated,

Plaintiff,

v.

**BATH SAVER, INC. and BATH
FITTER MANUFACTURING INC.,**

Defendants.

Case No. 1:21-cv-01072-JPW

NOTICE OF SETTLEMENT AND MOTION TO STAY

Plaintiff Carol Miller (“Plaintiff”), by and through undersigned counsel, hereby notifies the Court that the parties have reached an agreement in principle to settle the litigated claims in this case on a class-wide basis, subject to Court approval. The parties are presently drafting a written Settlement Agreement and related documents. Plaintiff will file the Settlement Agreement and related documents with the Court as part of a Motion for Preliminary Approval by August 26, 2022.

Based on the foregoing, the parties respectfully request that all current deadlines be suspended pending the filing of the proposed Settlement Agreement.

DATED this 12th day of July, 2022. Respectfully submitted,

/s/ Avi R. Kaufman

Avi R. Kaufman (Trial Counsel)

Florida State Bar # 84382

kaufman@kaufmanpa.com

KAUFMAN P.A.

237 South Dixie Highway, Floor 4

Coral Gables, FL 33133

Telephone: (305) 469-5881

*Attorneys for Plaintiff and the putative
Classes*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on July 12, 2022, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF, and it is being served this day on all counsel of record via transmission of Notice of Electronic Filing generated by CM/ECF.

/s/ Avi R. Kaufman